

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

LLOYD NAPIER,	:	
	:	
Plaintiffs,	:	Case No. 1:25-cv-01573
	:	
v.	:	
	:	JURY TRIAL DEMANDED
BROCK & COMPANY, INC.; KEITH	:	
LONG; DAVID GRANT; ABC	:	
CORPORATIONS 1-5 (fictitious names	:	
describing presently unidentified business	:	
entities); and JOHN DOES 1-5 (fictitious	:	
names describing presently unidentified	:	
individuals),	:	
	:	
Defendants.	:	

STIPULATION EXTENDING TIME TO ANSWER COMPLAINT

Plaintiff Lloyd Napier and Defendants Brock & Company, Inc., Keith Long, and David Grant (collectively, “Defendants”) by and through their undersigned attorneys, hereby stipulate and agree that the time for Defendants to answer Plaintiff’s Complaint is hereby extended for a period of time up to and including March 31, 2025.

WHEREFORE, the parties respectfully request that the Court approve this stipulation.

**McOMBER McOMBER
& LUBER, PC**

/s/ Anna F. Esposito
Christian V. McComber, Esquire
Peter D. Valenzano, Esquire
Anna F. Esposito, Esquire
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*Counsel for Plaintiff,
Lloyd Napier*

Dated: March 7, 2025

KAUFMAN DOLOWICH LLP

/s/ Gregory Hyman
Gregory S. Hyman, Esquire
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Philadelphia, PA 19103
*Counsel for Defendants,
Brock & Company, Inc., Keith Long, and
David Grant*

Dated: March 7, 2025

SO ORDERED:

J.